

ORIGINAL

001445

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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AUG 24 2 11 PM '98

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Service

)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY (USPS-T1)
(AUGUST 24, 1998)

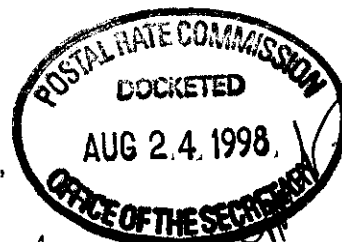
Pursuant to the Presiding Officer's Ruling No. MC98-1/3, the Office of the Consumer Advocate (OCA) hereby designates the following responses of USPS witness Garvey as the written cross-examination of the OCA, to be included in the record of this proceeding.

1. OCA Interrogatories T1-1-19, 22-29a, 30, T4-33 redirected from witness Rothschild, T5-3, T5-14 redirected from witness Plunkett and OCA-1-4 redirected from the Postal Service.
2. DBP Interrogatories T1-1-11, T5-4 redirected from witness Plunkett and T7-2 redirected from witness Wilcox.
3. DFC Interrogatories T1-1-6 and T5-2 redirected from witness Plunkett.
4. MASA Interrogatories T1-1-11, T3-2-3 redirected from witness Stirewalt, T5-8 and T5-10 redirected from witness Plunkett.
5. Response to POIR No. 1, Items 1-5.

Respectfully submitted,

Emmett Rand Costich

EMMETT RAND COSTICH
Acting Assistant Director
Office of the Consumer Advocate



CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Emmett Rand Costich

EMMETT RAND COSTICH
Attorney

Washington, D.C. 20268-0001
August 24, 1998

ORIGINAL

001455

BEFORE THE
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WASHINGTON, D.C. 20268-0001

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Mailing Online Service)

Docket No. MC98-1

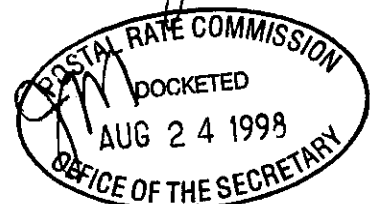
OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: PAUL G. SECKAR (USPS-T-2)
(August 24, 1998)

Presiding Officer's Ruling No. MC98-1/3 expressed the view that "the testimony of each of the eight witnesses offering direct evidence on behalf of the Postal Service is in some way relevant to the market test." Accordingly, the ruling provides that all eight pieces of testimony, including the testimony of witnesses not scheduled for oral cross-examination, are to be received in evidence on August 26. Logically, all witnesses' answers to written cross-examination should also be received in evidence at that time. The Office of the Consumer Advocate (OCA) therefore designates the following responses of USPS witness Seckar as the written cross-examination of the OCA, to be included in the record of this proceeding:

1. OCA-T2-1-9; and OCA-T5-4b.-d., and f. (redirected from witness Plunkett).
2. DBP-T2-1-2.
3. MASA-T2-1, 2, 3.a. and b., 4.c. and d., and 5 (re-numbered).

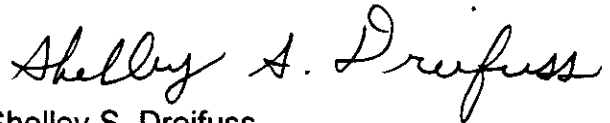
Respectfully submitted,

Shelley S. Dreifuss
Shelley S. Dreifuss
Attorney



CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script that reads "Shelley S. Dreifuss".

Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
August 24, 1998

ORIGINAL
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing On Line Service

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT (USPS-T3)
(AUGUST 25, 1998)

Pursuant to the Presiding Officer's Ruling No. MC98-1/3, the Office of the Consumer Advocate (OCA) hereby designates the following responses of USPS witness Stirewalt as the written cross-examination of the OCA, to be included in the record of this proceeding.

1. OCA Interrogatories T3-1-16.
2. MASA Interrogatories T3-1 and 4-7.

Respectfully submitted,

Emmett Rand Costich

EMMETT RAND COSTICH
Acting Assistant Director
Office of the Consumer Advocate

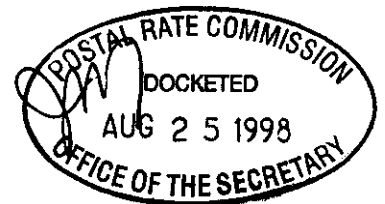
CERTIFICATE OF SERVICE

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Emmett Rand Costich

EMMETT RAND COSTICH
Attorney

Washington, D.C. 20268-0001
August 25, 1998



ORIGINAL

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BEFORE THE
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Service)

Docket No. MC98-1

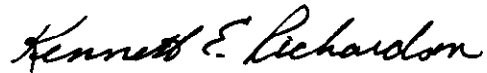
OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: BETH B. ROTHSCHILD (USPS-T-4)
(AUGUST 25, 1998)

Presiding Officer's Ruling No. MC98-1/3 expressed the view that "the testimony of each of the eight witnesses offering direct evidence on behalf of the Postal Service is in some way relevant to the market test." Accordingly, the ruling provides that all eight pieces of testimony, including the testimony of witnesses not scheduled for oral cross-examination, are to be received in evidence on August 26. Logically, all witnesses' answers to written cross-examination should also be received in evidence at that time. The Office of the Consumer Advocate (OCA) therefore designates the following responses of USPS witness Rothschild as the written cross-examination of the OCA, to be included in the record of this proceeding:

1. DBP Interrogatory T4-1;
2. MASA Interrogatories T4-1-4, T5-9 redirected from witness Plunkett; and
3. OCA Interrogatories T4-1-32, 34-35.



Respectfully submitted,

A handwritten signature in cursive script, reading "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script, reading "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
August 25, 1998

ORIGINAL

001443

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: MICHAEL K. PLUNKETT (USPS-T-5)
(AUGUST 24, 1998)

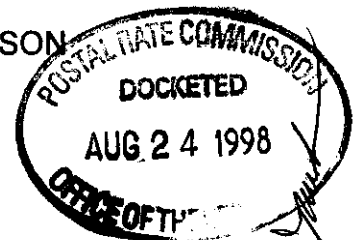
Pursuant to the Presiding Officer's Ruling No. MC98-1/3, the Office of the Consumer Advocate (OCA) hereby designates the following responses of USPS witness Plunkett as the written cross-examination of the OCA, to be included in the record of this proceeding.

1. DBP Interrogatories T5-1-3;
2. DFC Interrogatory T5-1;
3. MASA Interrogatories T5-1-7, T2-3C, 4(A-B) redirected from witness Seckar;
4. NAA Interrogatories T5-1-4; and
5. OCA Interrogatories T5-1-2, 4(A), (E), 5-13, 15-27.

Respectfully submitted,

Kenneth E. Richardson

KENNETH E. RICHARDSON
Attorney



CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script, appearing to read "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
August 24, 1998

ORIGINAL

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Docket No. MC98-1

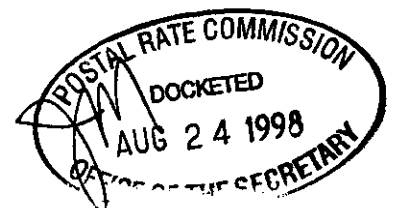
OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: JOHN HAMM (USPS-T-6)
(August 24, 1998)

Presiding Officer's Ruling No. MC98-1/3 expressed the view that "the testimony of each of the eight witnesses offering direct evidence on behalf of the Postal Service is in some way relevant to the market test." Accordingly, the ruling provides that all eight pieces of testimony, including the testimony of witnesses not scheduled for oral cross-examination, are to be received in evidence on August 26. Logically, all witnesses' answers to written cross-examination should also be received in evidence at that time. The Office of the Consumer Advocate (OCA) therefore designates the following responses of USPS witness Hamm as the written cross-examination of the OCA, to be included in the record of this proceeding:

1. OCA-T6-1-8.
2. DBP-T6-2-3.

Respectfully submitted,

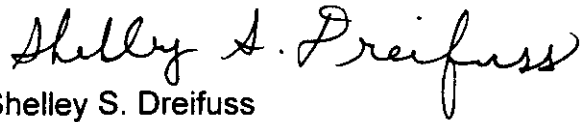
Shelley S. Dreifuss
Shelley S. Dreifuss
Attorney



001458

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
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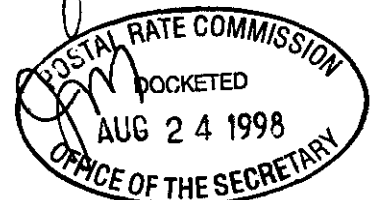
OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: LINDA WILCOX (USPS-T-7)
(August 24, 1998)

Presiding Officer's Ruling No. MC98-1/3 expressed the view that "the testimony of each of the eight witnesses offering direct evidence on behalf of the Postal Service is in some way relevant to the market test." Accordingly, the ruling provides that all eight pieces of testimony, including the testimony of witnesses not scheduled for oral cross-examination, are to be received in evidence on August 26. Logically, all witnesses' answers to written cross-examination should also be received in evidence at that time. The Office of the Consumer Advocate (OCA) therefore designates the following responses of USPS witness Wilcox as the written cross-examination of the OCA, to be included in the record of this proceeding:

1. OCA-T7-1-9.
2. DBP-T7-1.
3. DFC-T7-1-2
4. MASA-T7-1 (as amended).

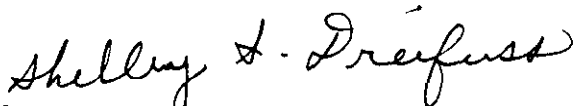
Respectfully submitted,

Shelley S. Dreifuss
Shelley S. Dreifuss
Attorney



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Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
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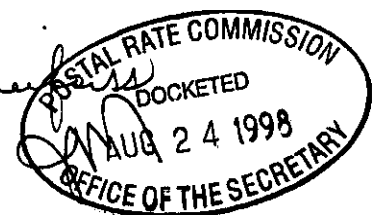
OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
WITNESS: FRANK E. CAMPANELLI (USPS-T-8)
(August 24, 1998)

Presiding Officer's Ruling No. MC98-1/3 expressed the view that "the testimony of each of the eight witnesses offering direct evidence on behalf of the Postal Service is in some way relevant to the market test." Accordingly, the ruling provides that all eight pieces of testimony, including the testimony of witnesses not scheduled for oral cross-examination, are to be received in evidence on August 26. Logically, all witnesses' answers to written cross-examination should also be received in evidence at that time. The Office of the Consumer Advocate (OCA) therefore designates the following responses of USPS witness Campanelli as the written cross-examination of the OCA, to be included in the record of this proceeding:

1. OCA-T8-1 and 3-11.
2. DBP-T8-1-2 and 4-5.
3. MASA-T8-1.

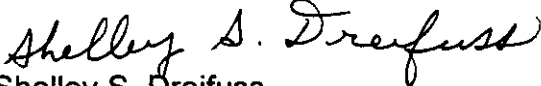
Respectfully submitted,

Shelley S. Dreifuss
Shelley S. Dreifuss
Attorney



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Shelley S. Dreifuss
Attorney

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